GRATUITY DISCLOSURE FORM

Shelby County Ethics Commission

INSTRUCTIONS: This form is for all persons receiving any Shelby County Government contract, land use approval or financial grant money to report any gratuity that has been given, directly or indirectly, to any elected official, employee or appointee (including their spouses and immediate family members) who is involved in the decision regarding the contract, land use approval, or financial grant of money.

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Wal-Mart Real Estate Business Trust

2. DATE OF GRATUITY

Not Applicable

3. NATURE AND PURPOSE OF THE GRATUITY

Not Applicable

4. NAME OF THE OFFICIAL, EMPLOYEE, APPOINTEE, OR FAMILY MEMBER WHO RECEIVED THE GRATUITY

Not Applicable

5. NAME OF THE PERSON OR ENTITY THAT PROVIDED THE GRATUITY

Not Applicable

6. ADDRESS OF THE PERSON OR ENTITY THAT PROVIDED THE GRATUITY

Not Applicable

7. DESCRIPTION OF THE GRATUITY

Not Applicable

8. COST OF THE GRATUITY (If cost is unknown and not reasonably discernible by the person giving the gratuity, then the person giving the gratuity shall report a good faith estimate of the cost of the gratuity.)

Not Applicable

9. The information contained in this Gratuity Disclosure Form, and any supporting documentation or materials referenced herein or submitted herewith, is true and correct to the best of my knowledge, information and belief and affirm that I have not given, directly or indirectly, any gratuity to any elected official, employee or appointee (including spouse and immediate family members) that has not been disclosed and I affirm that I have not violated the provisions of the Shelby County Government Code of Ethics.

Signature

8/25/08 Date

Michael E. Gardner Regional V.P. Real Estate Print Name

A copy of your completed form will be placed on the Shelby County Internet website.